



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 24, 2023

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
United States District Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Lars Winkelbauer, et al.*, 23 Cr. 133 (JMF)

Dear Judge Furman,

The parties in the above-captioned action write to jointly request a modification to the proposed briefing schedule for pre-trial motions, as detailed below.

On May 5, 2023, this Court entered a scheduling order in this matter directing, *inter alia*, that defense motions be filed by November 14, 2023. Since that time, the parties have been engaged in discussions regarding potential pre-trial resolutions. Those discussions are ongoing and, at least as to several defendants, are unlikely to conclude before November 14. In order to permit time for further discussions, and in an effort to narrow the issues to be put before the Court on motion practice, the parties jointly respectfully request that the Court adjourn the schedule for the filing of defense motions, as set forth below:

	Original Date	Requested Date
Defense Motions to Be Filed	November 14, 2023	February 6, 2024
Government Opposition to Be Filed	December 12, 2023	March 5, 2024
Replies to Be Filed	December 20, 2023	March 12, 2024
Next Pretrial Conference	January 23, 2024 at 3 p.m.	A date to be determined by the Court in March or April, 2024

The parties are not seeking to adjust any of the other deadlines in the Court's May 5 order, including the dates for expert disclosures and the October 28, 2024 trial date.

To the extent the Court adjourns the pretrial conference scheduled for January 23, 2024, the Government further respectfully requests that the Court exclude time between January 23, 2024 and the date of the rescheduled conference to permit the defendants' review of discovery, further

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discussions of pre-trial resolutions, and the filing of motions. The Government has conferred with counsel for all defendants, each of whom consents to the exclusion of time.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

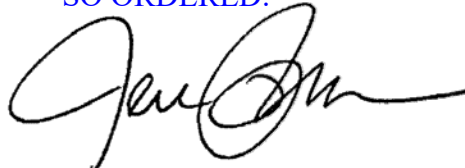
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cc: All Defense Counsel (by ECF)

The deadline for any defense motions is hereby EXTENDED to January 18, 2024. Any opposition shall be filed by February 15, 2024; and any reply shall be filed by February 22, 2024. The January 23, 2024 pretrial conference remains in effect. The Clerk of Court is directed to terminate Docket No. 135.

SO ORDERED.



October 24, 2023